

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

FILED

NOV 12 2015 DB

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN.

Sylvia Cobbins

Name of Plaintiff

v.

Metro School Board
of Education

Name of Defendant(s)

Case No. _____

(To be assigned by Clerk)

Jury Demand ☐ Yes ☐ No

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination. Jurisdiction is specifically conferred upon the Court by 42 U.S.C. § 2000e-5, or, if the Plaintiff is a federal employee, by 42 U.S.C. § 2000e-16. Relief is sought under 42 U.S.C. § 2000e-5(g) and/or 42 U.S.C. § 1981a(b).

2. Plaintiff, Sylvia Cobbins, is a citizen of the United States and resides at

108 Chestnut Street, Nashville,
Street address City

Davidson, Tenn, 37210, 615-618-5662
County State Zip Code Telephone Number

3. Defendant, Metro Schools resides at, or its business is located at

2601 Bransford Ave, Nashville,
Street address City

Davidson, Tenn, 37204
County State Zip Code

(If more than one Defendant, list the name and address of each additional Defendant)

N/A

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at
Board of Education 2601 Bradford Ave. Nash
 Street address City
Davidson Tenn 37204
 County State Zip Code
5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about 2010/2015
 Month Day Year
6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about
 Month Day Year
7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on _____
 Month
 _____, a copy of which Notice is attached.
 Day Year
8. Because of Plaintiff's (1) _____ race, (2) _____ color, (3) _____ sex,
 (4) _____ religion, (5) _____ national origin, the Defendant:

- a. _____ failed to employ Plaintiff.
- b. _____ terminated Plaintiff's employment.
- c. _____ failed to promote Plaintiff.
- d. _____ retaliated against Plaintiff for having filed a charge of discrimination.
- e. ☒ other. Explain: I BEEN WORKING FOR Metro

School since 95 and I was injured on duty
7-1-~~2009~~²⁰¹⁰ 1st day of disability 6-30-2018 last day
on payroll 2-7-2009 last day I worked and
I have several medical issues with doctors statements

9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

I was denied I ~~did~~ received an Unfavorable
decision from the Appeal Council. And
I have several statements saying I cannot
work. A representative from Metro School started
threatening me and harassing me by saying if I didn't
attend school I will not receive my pension. Although
doctor records ~~show~~ show severe issues with fine motor skills,
 (You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. _____ are still being committed by Defendant.
- b. ☒ are no longer being committed by Defendant.
- c. _____ may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

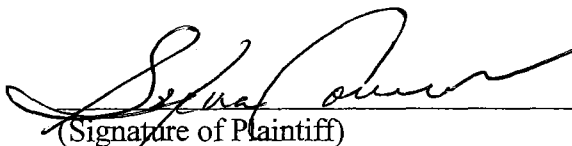
WHEREFORE, Plaintiff prays that the Court grant the following relief:

- a. _____ direct that Defendant employ Plaintiff, or
- b. _____ direct that Defendant re-employ Plaintiff, or
- c. _____ direct that Defendant promote Plaintiff, or
- d. ☒ order other equitable or injunctive relief: _____

e. ☒ direct that Defendant pay Plaintiff back pay in the amount of from the time filed and interest on back pay;

f. _____ direct that Defendant pay Plaintiff compensatory damages: Specify the amount and basis for compensatory damages: _____

g. _____ direct that Defendant pay Plaintiff punitive damages in the amount of _____ because Defendant engaged in a discriminatory practice or practices with malice or with reckless indifference to Plaintiff's federally protected rights, as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may be appropriate, including costs and attorney's fees.


(Signature of Plaintiff)